



IT IS HEREBY ADJUDGED and DECREED that the below described is SO ORDERED.

Dated: August 01, 2023.

A handwritten signature in black ink, appearing to read "Mike Parker".

**MICHAEL M. PARKER
UNITED STATES BANKRUPTCY JUDGE**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:

**DEEPROOT CAPITAL MANAGEMENT, LLC,
ET AL.,¹**

DEBTORS.

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CASE NO. 21-51523-MMP

CHAPTER 7

**JOINTLY ADMINISTERED UNDER
CASE NO. 21-51523-MMP**

**ORDER GRANTING IN PART
FOURTH INTERIM APPLICATION FOR ALLOWANCE OF LEGAL FEES AND EXPENSES
FOR PULMAN, CAPPUCCIO & PULLEN, LLP, AS COUNSEL TO THE TRUSTEE
FOR THE TIME PERIOD OF FEBRUARY 1, 2023 TO MAY 31, 2023**

¹ The jointly administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a "Bankruptcy Estate" and collectively, "Bankruptcy Estates."

Came on for consideration the *Fourth Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of February 1, 2023 to May 31, 2023* (“**Fourth Interim Application**”). The Court has considered the Fourth Interim Application and finds that the fees and expenses represent reasonable compensation for actual and necessary services, and reimbursement for actual, necessary expenses. After considering the pleadings, the Court also finds that (i) it has jurisdiction over the matters raised in the Fourth Interim Application pursuant to 28 U.S.C. § 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) proper and adequate notice of the Fourth Interim Application has been given and that no other or further notice is necessary; (iv) all objections to the Fourth Interim Application have been resolved by this *Order* or are overruled in their entirety; and (v) upon the record herein after due deliberation thereon good and sufficient cause exists for the granting in part of the relief as set forth herein. It is, therefore,

ORDERED that the Fourth Interim Application pursuant to 11 U.S.C. § 330 is hereby **GRANTED IN PART**. It is further

ORDERED that the fees in connection with the legal services described in the Fourth Interim Application are allowed in part. All interim fees in the amount of **\$231,544.50**² and all expenses in the amount of \$8,544.81, for the allowance of a total of **\$240,089.31** in hourly fees and costs, shall be an administrative expense of the respective Bankruptcy Estates³ as outlined in the Fourth Interim Application. It is further

² The Court finds that certain time entries, highlighted in the attached Exhibit A, to be noncompensable as clerical work. The amount of the award thus reflects Applicant’s requested interim fees of \$232,556.50 less \$1,012, the amount of the amount of the noncompensable time entries.

³ Capitalized terms shall have the meaning ascribed to them in the Fourth Interim Application.

ORDERED that the Trustee is authorized to immediately pay Applicant in connection with the hourly services provided, fees and expenses totalling \$240,089.31 from the specific Bankruptcy Estate accounts, as designated in the chart attached hereto as Exhibit 1. It is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this *Order*.

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EXHIBIT 1

PC&P Matter No.	Matter Description	Debtor Estate	Fees	Expenses	Hours
1934.001	Main Bankruptcy Case	Policy Services, Inc. Case No. 21-51513	\$34,795.00	\$1,232.39	90.20
1934.002	SEC Matter	deeproot Funds, LLC, Case No. 21-51521	\$10,613.50	\$0.00	27.30
1934.003	CCW Matter	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.004	Ohana Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.005	Cycladic Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.006	Jill R. Winn Net Winner	Policy Services, Inc., Case No. 21-51513	\$2,505.00	\$15.00	13.50
1934.007	Mueller Matter	Policy Services, Inc., Case No. 21-51513	\$12,695.00	\$1,378.60	33.70
1934.008	Net Winners Matter	Policy Services, Inc., Case No. 21-51513	\$3,385.00	\$0.00	17.00
1934.009	Nationwide Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.0
1934.010	Pinball Matter	deeproot Tech, LLC, Case No. 21-51520	\$487.50	\$0.00	1.30
1934.011	Finders Matter	Policy Services, Inc., Case No. 21-51513	\$13,757.50	\$0.00	52.70
1934.012	Financial Horizons Concepts Finder	Policy Services, Inc., Case No. 21-51513	\$5,093.50	\$0.00	37.00
1934.013	Kenneth & Brownie Martin Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$3,085.00	\$0.00	18.30
1934.014	David & Mary Medlang Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$27.50	\$0.00	0.10
1934.015	Financial Partners of America Finder	Policy Services, Inc., Case No. 21-51513	\$1,886.50	\$0.00	10.90
1934.016	INF Solutions LLC Finder	Policy Services, Inc., Case No. 21-51513	\$4,972.50	\$0.00	38.70
1934.017	GM Consultants Group Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$3,097.50	\$10.00	21.80
1934.018	Candice Gillen Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,387.50	\$0.00	4.80
1934.019	Alice Snell Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,450.00	\$57.50	9.00

1934.020	Carl & Paula Jarnecke/Trust Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,777.50	\$0.00	6.60
1934.021	D. Stien/Fidelity Mutual Finder	Policy Services, Inc., Case No. 21-51513	\$1,322.50	\$0.00	9.90
1934.022	McNamara Cap. Investmt Grp Finder	Policy Services, Inc., Case No. 21-51513	\$4,220.50	\$5.00	23.20
1934.023	PGH Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$11,140.50	\$3,336.47	51.90
1934.024	Jacob Proux Finder	Policy Services, Inc., Case No. 21-51513	\$1,471.50	\$0.00	8.60
1934.025	John M Vizy Finder	Policy Services, Inc., Case No. 21-51513	\$1,732.00	\$15.00	10.70
1934.026	Mark Zabinski Finder	Policy Services, Inc., Case No. 21-51513	\$6,172.50	\$0.00	17.70
1934.027	CMB/Wiley Carter Finder	Policy Services, Inc., Case No. 21-51513	\$4,095.50	\$130.00	25.80
1934.028	Purpose Driven Fin. Servs. Finder	Policy Services, Inc., Case No. 21-51513	\$3,480.50	\$5.00	23.50
1934.029	Premier Group Enterpr. Finder	Policy Services, Inc., Case No. 21-51513	\$2,632.50	\$5.00	19.50
1934.030	Dennis Wirth, Agent Adv. Grp. Finder	Policy Services, Inc., Case No. 21-51513	\$3,589.00	\$0.00	24.50
1934.031	Michael Cales Finder	Policy Services, Inc., Case No. 21-51513	\$3,212.00	\$0.00	23.50
1934.032	George M Villa Finder	Policy Services, Inc., Case No. 21-51513	\$5,068.50	\$5.00	29.60
1934.033	Randy Seymour Finder	Policy Services, Inc., Case No. 21-51513	\$4,271.00	\$5.00	24.70
1934.034	Raul T Gomez Finder	Policy Services, Inc., Case No. 21-51513	\$3,673.00	\$5.00	24.80
1934.035	RD and J, Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$5,465.50	\$5.00	36.80
1934.036	David Rosen Finder	Policy Services, Inc., Case No. 21-51513	\$1,015.00	\$40.00	5.90
1934.037	Bob Patrick Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.038	Crissman Crombie Finder	Policy Services, Inc., Case No. 21-51513	\$1,682.50	\$0.00	11.60
1934.039	Agents Insur. Sales & Svv. Finder	Policy Services, Inc., Case No. 21-51513	\$4,985.50	\$22.00	24.20

1934.040	Hart Financial Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.041	Savings Options & Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.042	Shantell Wright Finder	Policy Services, Inc., Case No. 21-51513	\$2,297.50	\$5.00	15.50
1934.043	Steven Fortier Finder	Policy Services, Inc., Case No. 21-51513	\$2,065.00	\$30.00	14.90
1934.044	David Obman Finder	Policy Services, Inc., Case No. 21-51513	\$4,492.50	\$0.00	28.40
1934.045	Scott Nazarino Finder	Policy Services, Inc., Case No. 21-51513	\$755.00	\$50.00	2.50
1934.046	Senior Insurance Service Finder	Policy Services, Inc., Case No. 21-51513	\$2,342.50	\$0.00	14.40
1934.047	Safe Money Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$5,721.00	\$0.00	24.80
1934.048	CWB Investment Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$1,355.00	\$0.00	7.50
1934.049	Dianne McClish Finder	Policy Services, Inc., Case No. 21-51513	\$357.50	\$0.00	1.30
1934.050	Blanchard & Assoc. Finder	Policy Services, Inc., Case No. 21-51513	\$1,487.00	\$0.00	9.80
1934.051	Azar Parchami Finder	Policy Services, Inc., Case No. 21-51513	\$1,800.00	\$0.00	9.40
1934.052	Great Lakes Wealth Mgmt Finder	Policy Services, Inc., Case No. 21-51513	\$352.50	\$0.00	1.20
1934.053	Domonic Cotton Finder	Policy Services, Inc., Case No. 21-51513	\$1,640.00	\$0.00	12.80
1934.054	Flemming Financial Serv. Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$3,810.50	\$0.00	19.00
1934.055	Gregory Talbot Finder	Policy Services, Inc., Case No. 21-51513	\$2,917.50	\$0.00	20.60
1934.056	Jack Nace Finder	Policy Services, Inc., Case No. 21-51513	\$1,790.00	\$0.00	14.30
1934.057	G-Force Technical Matter	Policy Services, Inc., Case No. 21-51513	\$6,467.50	\$1,837.85	22.70
1934.058	Luxor Financial Group Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.059	American Express Co. Matter	Policy Services, Inc., Case No. 21-51513	\$5,960.00	\$0.00	17.30
1934.060	TuYo v. Transamerica Life Matter	Policy Services, Inc., Case No. 21-51513	\$13,385.00	\$0.00	36.70

1934.061	Carlile, Patchen & Murphy Matter	Policy Services, Inc., Case No. 21-51513	\$27.50	\$0.00	0.10
1934.062	JP Morgan Chase Matter	Policy Services, Inc., Case No. 21-51513	\$2,275.00	\$350.00	6.10
	Total:		\$231,544.50	\$8,544.81	1058.60

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Exhibit A

May 31, 2023

Lowe, Pat (dprr)

Statement No. 236892

Account No. 1934.001

Deeproot - Policy Services, Inc. Case No. 21-51513

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				Rate	Hours	
	WDM B160	A103	Draft/revise Second Interim Fee App for Greg Murray as accountant to Trustee.	375.00	2.80	1,050.00
	WDM B160	A105	Meet with Randall A. Pulman, review Second Interim Fee Application for Greg Murray.	375.00	0.20	75.00
	WDM B160	A108	Correspondence with Pat Lowe regarding Second Interim Fee App for Greg Murray.	375.00	0.20	75.00
03/03/2023	WDM B160	A108	Correspondence with Pat Lowe regarding Supplement to First Interim Fee Application, and Seconding Interim Fee Application for Greg Murray.	375.00	0.20	75.00
03/10/2023	RAP B190	A108	Review of information in deeproot portal; telephone conference with Turner regarding same.	500.00	1.00	500.00
03/14/2023	PR3 B110	A110	Manage data/files - Scanning and saving original financial documents from Silicon Drive Office	110.00	3.50	385.00
04/12/2023	WDM B160	A104	Review/analyze time entries for accuracy and reasonableness in connection with Fourth Interim Fee Application.	375.00	2.90	1,087.50
04/13/2023	WDM B160	A104	Review and edit billing statements/time entries for accuracy and reasonableness in connection with 4th Interim Fee Application.	375.00	1.60	600.00
04/18/2023	WDM B190	A104	Review/analyze claims submitted by Lynn Jurek on behalf of her clients.	375.00	0.60	225.00
04/24/2023	WDM B190	A104	Review/analyze recently filed amended proofs of claim.	375.00	0.50	187.50
05/01/2023	WDM B190	A108	Email correspondence with Chris Turner regarding FedEx subpoena.	375.00	0.20	75.00
05/02/2023	WDM B190	A108	Communicate (other external) with Chris Turner regarding FedEx subpoena.	375.00	0.20	75.00

PULMAN, CAPPUCCIO & PULLEN, LLP

Attorneys & Counselors

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Lowe, Pat (dprt)
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2402 E. Main St.
Uvalde, TX 78801

May 31, 2023

Invoice No. 236893
Account No. 1934.002

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(deeproot funds) SEC v. Robert J. Mueller, Deeproot Funds, L

Fees

					Rate	Hours	
02/09/2023	PR3	B110	A110	Manage data/files - Searching emails and saving them to ND	110.00	1.10	121.00
02/10/2023	WDM	B190	A104	Review/analyze email from FBI to Trustee requesting production of information concerning life insurance policies. Review debtor files for responsive documents.	375.00	0.80	300.00
02/15/2023	AKM	B190	A101	Review of subpoenas.	275.00	0.30	82.50
02/21/2023	LSH	B120	A107	Telephone conference with SEC counsel regarding engagement letter between Mueller/deeproot and Carlile Patchen & Murphy LLP.	450.00	0.10	45.00
	LSH	B120	A105	Communicate (in firm) regarding engagement letter between Mueller/deeproot and Carlile Patchen & Murphy LLP.	450.00	0.10	45.00
02/24/2023	RAP	B190	A109	Telephone conference with SEC counsel regarding attorney client privilege issues; review of correspondence regarding same.	500.00	0.50	250.00
	LSH	B120	A104	Review/analyze documents and emails regarding attorney-client privilege issues.	450.00	0.50	225.00
02/28/2023	PR3	B110	A110	Manage data/files - searching for and saving Engagement Letter from CPM	110.00	1.00	110.00
	LSH	B120	A108	Review engagement letter with Carlile			

May 31, 2023

Lowe, Pat (dprt)

Statement No. 236893

(deeproot funds) SEC v. Robert J. Mueller, Deeproot

Account No. 1934.002

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				Patchen & Murphy LLP; email to SEC regarding same.	Rate	Hours	
	RAP	B190	A104	Review of engagement agreement with CPM.	450.00	0.10	45.00
					500.00	0.20	100.00
03/08/2023	RAP	B190	A108	Telephone conference with counsel for SEC regarding deposition and attorney client privilege information.	500.00	0.50	250.00
	WDM	B190	A104	Review/analyze documents responsive to request for life insurance documents.	375.00	0.30	112.50
	LSH	B120	A104	Review/analyze final judgment against debtor defendants.	450.00	0.30	135.00
03/09/2023	RAP	B190	A108	Attend the deposition of Robert Mueller.	500.00	5.50	2,750.00
	WDM	B190	A109	Attend portion of SEC deposition of Robert Mueller.	375.00	3.00	1,125.00
	LSH	B120	A109	Appear for/attend portion of deposition of Robert Mueller.	450.00	3.00	1,350.00
03/13/2023	RAP	B190	A108	Telephone conference with SEC and Mueller's counsel regarding privilege issues.	500.00	0.50	250.00
	LSH	B120	A108	Video conference with counsel regarding claim of privileged documents.	450.00	0.60	270.00
	LSH	B120	A108	Video conference with R. Pulman and J. Hulings regarding privilege claims potential resolution.	450.00	0.60	270.00
04/12/2023	RAP	B190	A104	Telephone conference with SEC's counsel regarding status of adversary and possible consolidation with SEC action.	500.00	1.00	500.00
	LSH	B120	A108	Telephone conference with SEC Counsel and R. Pulman.	450.00	0.80	360.00
04/14/2023	PR3	B110	A110	Manage data/files - Saving CPM Electronic Files to ND	110.00	1.00	110.00
04/19/2023	PR3	B110	A110	Manage data/files - Uploading and managing CPM files in Eclipse	110.00	2.00	220.00
04/20/2023	PR3	B110	A110	Manage data/files - Uploading and managing CPM files in Eclipse	110.00	2.00	220.00

May 31, 2023

Lowe, Pat (dprt)

Statement No. 236893

(deeproot funds) SEC v. Robert J. Mueller, Deeproot

Account No. 1934.002

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					Rate	Hours	
04/21/2023	PR3	B110	A110	Manage data/files - loading and saving documents into LD	110.00	0.60	66.00
04/27/2023	LSH	B120	A108	Telephone conference with SEC counsel and R. Pulman.	450.00	0.50	225.00
	LSH	B120	A104	Review recent pleadings and orders.	450.00	0.50	225.00
	LSH	B120	A108	Email to counsel for Ascentium regarding scope of order granting motion to permit state court litigation to proceed.	450.00	0.10	45.00
05/04/2023	LSH	B120	A108	Review and respond to email from counsel for Ascentium.	450.00	0.10	45.00
05/09/2023	WDM	B190	A104	Review/analyze amended proofs of claim filed by SEC.	375.00	0.30	112.50
05/23/2023	LSH	B120	A104	Review/analyze documents received from SEC.	450.00	0.40	180.00
05/25/2023	RAP	B160	A104	Telephone conference with Mueller's counsel regarding mediation; e-mail regarding same.	500.00	0.50	250.00
	LSH	B120	A104	Review/analyze documents received from SEC.	450.00	0.50	225.00
	LSH	B120	A103	Draft/revise motion to strike jury demand.	450.00	0.40	180.00
05/26/2023	RAP	B190	A104	Telephone conference with P. Lowe regarding mediation dates.	500.00	0.20	100.00
				For Legal Services Rendered		29.90	10,899.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	8.90	\$500.00	\$4,450.00
W. Drew Mallender	4.40	375.00	1,650.00
Anna K. MacFarlane	0.30	275.00	82.50
PARA-3	7.70	110.00	847.00
Leslie Hyman	8.60	450.00	3,870.00

Total Current Work

10,899.50

May 31, 2023

Lowe, Pat (dprt)

Statement No. 236899

Account No. 1934.012

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Claims against Financial Horizon Concepts LLC - F

				Disclosures.	Rate 500.00	Hours 0.20	100.00
04/14/2023	AKM	B190	A101	Draft Motion to Amend Scheduling Order for filing.	275.00	0.60	165.00
04/15/2023	GM	B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.	100.00	0.50	50.00
04/17/2023	AKM	B190	A101	Final review of discovery requests; putting in final for service on opposing counsel; serving discovery on opposing counsel via e-mail.	275.00	0.60	165.00
	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.40	110.00
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101	Emails with Greg Hauswirth regarding deadlines for discovery and disclosures.	275.00	0.20	55.00
	AKM	B190	A101	Review of initial disclosures from Defendants.	275.00	0.10	27.50
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00
05/17/2023	GM	B190	A101	Research and prepare motion for withdrawal of jury demand; confer with Randall A. Pulman regarding same.	100.00	4.00	400.00
	RAP	B190	A101	Review of Gaurav Mankotia research and confer with Gaurav Mankotia regarding same.	500.00	0.50	250.00
05/19/2023	GM	B190	A101	Prepare a letter regarding withdrawal of jury demand along with an agreed order; confer with Randall A. Pulman regarding same.	100.00	3.00	300.00
	RAP	B190	A101	Review and edit of Gaurav Mankotia letter.	500.00	0.50	250.00
05/22/2023	GM	B190	A101	Continue prepare and amend letter			

May 31, 2023

Lowe, Pat (dprt)

Statement No. 236903

Account No. 1934.016

Claims against INF Solutions LLC - Finder

Page: 2

					Rate	Hours	
				Anna MacFarlane edits; confer with Anna MacFarlane and Jamie regarding same.	100.00	0.50	50.00
	AKM	B190	A101	Review of draft RFPs.	275.00	0.30	82.50
03/15/2023	PR3	B110	A110	Manage data/files - Searching for and saving emails in ND	110.00	3.00	330.00
03/29/2023	GM	B190	A101	Drafted supplementary 26(a) disclosure; analysed 333 emails and segregated relevant emails; confer with Anna regarding same; e-mail Anna the same.	100.00	7.00	700.00
04/04/2023	GM	B190	A101	Continue prepare and amend 26(a) Supplementary Disclosures; further read through emails for Witness list; confer with Anna regarding same; email Anna the same.	100.00	5.00	500.00
04/07/2023	AKM	B190	A101	Review of supplemental disclosures.	275.00	0.50	137.50
04/11/2023	AKM	B190	A101	Final review of supplemental disclosures.	275.00	0.10	27.50
	RAP	B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.	500.00	0.20	100.00
04/14/2023	AKM	B190	A101	Draft Motion to Amend Scheduling Order for filing.	275.00	0.60	165.00
04/15/2023	GM	B190	A101	Final review and editing of Rule 26 Disclosures.	100.00	0.50	50.00
04/17/2023	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.50	137.50
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
04/25/2023	AKM	B190	A101	Phone call with opposing counsel regarding extension of discovery response deadline to May 3.	275.00	0.10	27.50

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May 31, 2023

Invoice No. 236908
 Account No. 1934.021

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Claims against D. Stein/Fidelity Mutual - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
03/27/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.50	150.00
04/03/2023	AKM	B190	A101	Review answer filed by Defendants.	275.00	0.20	55.00
04/13/2023	GM	B190	A101	Prepare Rule 26 Disclosures and Request for Production of Documents; Read through email correspondence for witness list.	100.00	3.00	300.00
04/15/2023	AKM	B190	A101	Review draft discovery and disclosures.	275.00	0.50	137.50
04/17/2023	AKM	B190	A101	Final review of discovery requests; putting in final for service on opposing counsel; serving discovery on opposing counsel via e-mail.	275.00	0.60	165.00
	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.40	110.00
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101	Review of initial disclosures from Defendants.	275.00	0.10	27.50
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00

May 31, 2023

Lowe, Pat (dprt)

Statement No. 236917

Account No. 1934.030

Claims against Dennis Wirth, Agent Advisory Grou

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					Rate	Hours	
04/11/2023	RAP	B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.	500.00	0.20	100.00
04/14/2023	AKM	B190	A101	Draft Motion to Amend Scheduling Order for filing.	275.00	0.60	165.00
04/15/2023	GM	B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.	100.00	0.50	50.00
	RAP	B190	A101	Review and edit Rule 26 Disclosures and Requests for production.	500.00	0.20	100.00
04/17/2023	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.50	137.50
	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.40	110.00
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101	Review of initial disclosures from Defendants.	275.00	0.10	27.50
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00
05/23/2023	GM	B190	A101	Prepare motion to strike jury demand along with an order and an appendix; arrange finders agreements on netdocs; confer with Randall A. Pulman regarding same.	100.00	3.50	350.00
				For Legal Services Rendered		24.60	3,616.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.40	\$500.00	\$700.00
Anna K. MacFarlane	3.30	275.00	907.50
PARA-3	1.90	110.00	209.00
Gaurav Mankotia	18.00	100.00	1,800.00

May 31, 2023

Lowe, Pat (dprt)

Statement No. 236918

Account No. 1934.031

Claims against Michael Cales - Finder

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					Rate	Hours	
03/29/2023	AKM	B190	A101	Drafting motion to amend scheduling order and proposed amended scheduling order.	275.00	1.00	275.00
04/02/2023	GM	B190	A101	Prepare Supplementary 26(a) disclosures; Read through 131 emails for Witness List.	100.00	3.00	300.00
04/03/2023	GM	B190	A101	Continue prepare Supplementary 26(a) disclosures.	100.00	3.50	350.00
04/04/2023	GM	B190	A101	Continue prepare 26(a) Supplementary Disclosures; confer with Anna regarding same; email Anna the same.	100.00	1.00	100.00
04/07/2023	AKM	B190	A101	Review of supplemental disclosures.	275.00	0.50	137.50
04/11/2023	AKM	B190	A101	Emails with opposing counsel regarding motions to amend scheduling order.	275.00	0.20	55.00
	AKM	B190	A101	Final review of initial disclosures.	275.00	0.10	27.50
	RAP	B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.	500.00	0.20	100.00
04/14/2023	AKM	B190	A101	Finalizing Motion to Amend Scheduling Order for filing.	275.00	0.50	137.50
04/15/2023	GM	B190	A101	Final review and editing of Rule 26 Disclosures.	100.00	0.50	50.00
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
04/25/2023	AKM	B190	A101	Phone call with opposing counsel regarding extension of discovery response deadline to May 3.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101	Review of initial disclosures from Defendant.	275.00	0.10	27.50
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00

May 31, 2023

Lowe, Pat (dprt)
Claims against RD and J, Inc. - Finder

Statement No. 236922
Account No. 1934.035
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				Rate	Hours	
			counsel; serving discovery on opposing counsel via e-mail.	275.00	0.60	165.00
	AKM	B190	A101 Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.40	110.00
04/18/2023	AKM	B190	A101 Review of court's order resetting docket call.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101 Review of initial disclosures from Defendants.	275.00	0.10	27.50
05/10/2023	GM	B190	A101 Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00
05/22/2023	GM	B190	A101 Prepare motion to strike jury demand along with an order and an appendix; arrange finders agreements on netdocs; confer with Randall A. Pulman regarding same.	100.00	3.50	350.00
	RAP	B190	A101 Office Conference with Gaurav Mankotia regarding Motion to Strike.	500.00	0.20	100.00
05/24/2023	LSH	B190	A103 Draft/revise motion to strike jury demand.	450.00	0.90	405.00
05/25/2023	GM	B190	A101 Continue prepare motion to strike jury demand after Leslie S. Hyman's comments, confer with Leslie S. Hyman regarding same.	100.00	4.00	400.00
	GM	B190	A101 Research for case laws on jury waiver.	100.00	1.00	100.00
05/30/2023	GM	B190	A101 Continue prepare and amend motion to strike jury demand; confer with Leslie S. Hyman regarding same.	100.00	3.00	300.00
05/31/2023	GM	B190	A101 Continue prepare and amend motion to strike jury demand; multiple conferences with Leslie S. Hyman; confer with Randall A. Pulman regarding same.	100.00	6.00	600.00
	LSH	B190	A103 Continue drafting motion to strike jury demand.	450.00	1.30	585.00
	LSH	B190	A102 Legal research regarding motion to strike jury demand.	450.00	0.60	270.00

May 31, 2023

Lowe, Pat (dprt)

Statement No. 236931

Account No. 1934.047

Claims against Safe Money Solutions - Finder

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Rate Hours

04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101	Review of initial disclosures from Defendants.	275.00	0.10	27.50
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00
05/15/2023	LSH	B120	A105	Conference with R. Pulman and A. MacFarlane regarding motion for summary judgment.	450.00	0.40	180.00
05/23/2023	GM	B190	A101	Prepare motion to strike jury demand along with an order and an appendix; arrange finders agreements on netdocs; confer with Randall A. Pulman regarding same.	100.00	3.50	350.00
05/25/2023	LSH	B120	A103	Begin drafting motion for summary judgment.	450.00	1.60	720.00
05/30/2023	AKM	B190	A101	Office conference and emails with Leslie S. Hyman regarding Motion for Summary Judgment.	275.00	0.30	82.50
	LSH	B120	A105	Conference with team regarding potential illegality of contract argument.	450.00	0.50	225.00
	LSH	B120	A102	Legal research regarding argument that the finder contract is illegal.	450.00	2.40	1,080.00
05/31/2023	LSH	B120	A103	Continue drafting motion for summary judgment.	450.00	3.10	1,395.00
				For Legal Services Rendered		24.90	5,748.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.20	\$500.00	\$100.00
Anna K. MacFarlane	2.10	275.00	577.50
PARA-3	1.10	110.00	121.00
Gaurav Mankotia	13.50	100.00	1,350.00
Leslie Hyman	8.00	450.00	3,600.00

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May 31, 2023

Invoice No. 236934
Account No. 1934.050

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Claims against Blanchard & Associates - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
03/03/2023	PR3	B110	A110	Manage data/files - searching and saving emails	110.00	0.70	77.00
03/22/2023	AKM	B190	A101	Review of answer.	275.00	0.20	55.00
04/13/2023	GM	B190	A101	Prepare Rule 26 Disclosures and Request for Production of Documents; Segregated email correspondence on netdocs; Read through 86 emails for witness list.	100.00	3.00	300.00
04/15/2023	AKM	B190	A101	Review draft discovery and disclosures.	275.00	0.50	137.50
04/16/2023	AKM	B190	A101	Continue review of draft discovery and disclosures.	275.00	0.50	137.50
04/17/2023	AKM	B190	A101	Final review of discovery requests; putting in final for service on opposing counsel; serving discovery on opposing counsel via e-mail.	275.00	0.60	165.00
	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.40	110.00
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101	Review of initial disclosures from Defendants.	275.00	0.10	27.50

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May 31, 2023

Invoice No. 236937
Account No. 1934.053

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Claims against Domonic Cotton - Finder

Fees

					Rate	Hours	
02/02/2023	AKM B180	A101	Review of summons served.		275.00	0.10	27.50
03/02/2023	AKM B190	A101	Review of Defendant's answer.		275.00	0.20	55.00
04/06/2023	GM B190	A101	Plan and prepare Rule 26 Disclosures and Request for Production of Documents; Read through email correspondence for witness list.		100.00	6.00	600.00
04/07/2023	AKM B190	A101	Review of RFP and initial disclosures.		275.00	0.50	137.50
04/11/2023	AKM B190	A101	Final review of initial disclosures.		275.00	0.10	27.50
	RAP B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.		500.00	0.20	100.00
04/15/2023	GM B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.		100.00	0.50	50.00
04/17/2023	AKM B190	A101	Draft Motion to Amend Scheduling Order; oversee filing of same.		275.00	0.60	165.00
04/18/2023	AKM B190	A101	Review of court's order resetting docket call.		275.00	0.10	27.50
05/01/2023	AKM B190	A101	Review of initial disclosures from Defendants.		275.00	0.10	27.50

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May 31, 2023

Invoice No. 236939
 Account No. 1934.055

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Claims against Gregory Talbot - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
02/08/2023	PR3	B110	A110	Manage data/files - Saving emails to ND	110.00	0.60	66.00
02/15/2023	PR3	B110	A110	Manage data/files - locating and saving emails to ND	110.00	0.50	55.00
03/23/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.50	150.00
04/17/2023	GM	B190	A101	Prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration, 4. Motion for Entry of Default, 5. Proposed Order, 6. RAP's Affidavit	100.00	6.00	600.00
04/18/2023	GM	B190	A101	Continue Prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration, 4. Motion for Entry of Default, 5. Proposed Order, 6. RAP's Affidavit	100.00	3.00	300.00
04/26/2023	AKM	B190	A101	Review request for clerk's entry of default; finalizing for filing; oversee filing of same.	275.00	0.60	165.00
	RAP	B190	A101	Review and approval of request for entry of clerk's default.	500.00	0.10	50.00

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May 31, 2023

Invoice No. 236940
Account No. 1934.056

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Claims against Jack Nace - Finder

Fees

					Rate	Hours	
02/02/2023	AKM B180	A101	Review of summons served.		275.00	0.10	27.50
03/02/2023	AKM B190	A101	Review of Defendant's answer.		275.00	0.20	55.00
04/01/2023	GM B190	A101	Prepare Rule 26 Disclosures and Request for Production of Documents; Review of email correspondence for witness list.		100.00	6.00	600.00
04/07/2023	AKM B190	A101	Review of RFP and initial disclosures.		275.00	0.50	137.50
04/11/2023	AKM B190	A101	Final review of initial disclosures.		275.00	0.10	27.50
	RAP B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.		500.00	0.20	100.00
	GM B190	A101	Continue prepare Rule 26 Disclosures and Request for Production of Documents; confer with Randall A. Pulman regarding same.		100.00	2.00	200.00
04/15/2023	GM B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.		100.00	0.50	50.00
04/17/2023	AKM B190	A101	Draft Motion to Amend Scheduling Order; oversee filing of same.		275.00	0.60	165.00
04/18/2023	AKM B190	A101	Review of court's order resetting docket call.		275.00	0.10	27.50